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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

JUL 25 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)
)
Revision of the Commission's Rules)
to Ensure Compatibility with Enhanced)
911 Emergency Calling Systems)

Petition of Richardson, Texas)

CC Docket 94-102/
(DA 01-1623)

COMMENTS OF TARRANT COUNTY 9-1-1 DISTRICT

The Tarrant County, Texas 9-1-1 District ("District") hereby responds to the Commission's invitation to comment further on the petition of the City of Richardson, Texas ("City") for a declaratory ruling concerning the prerequisites of a valid Phase II location service request from a Public Safety Answering Point ("PSAP") to a wireless carrier.¹ The District includes the County and each city partially in the County plus, since 1987, the City of Irving.

Like the petitioner in this proceeding, City of Richardson, the District has been delayed by VoiceStream in the effort to implement Phase II of the Commission's wireless E9-1-1 rules. On June 20, 2001, more than two months after its request for Phase II service, the District received the attached letter from the carrier. Apart from misquoting the amended rule adopted in the cited cost recovery order,² VoiceStream expressed the view that a ready PSAP must possess "mapping equipment which can display this location data in a meaningful and useful manner for the call taker."

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¹ DA 01-1623, July 10, 2001.

² VoiceStream referred generally to "recovering the costs of the service," while the rule reads on recovery of the PSAP's costs only.

As the FCC's call for additional comment indicates, nowhere do the E9-1-1 rules specify mapping equipment as a prerequisite. Nor should they. It is up to the carrier to deliver latitude and longitude of the caller and up to the PSAP to receive and utilize the information. The regulations do not prescribe the manner of use. They specify performance standards, not methods.

The District agrees with VoiceStream that all parties involved should strive to "make the most efficient use of the limited resources available to us for Phase II deployment." No party's resources are unlimited and each is held to standards of efficiency. This is as true for PSAPs and 9-1-1 authorities as it is for carriers. It was not efficient of VoiceStream, we submit, to delay by more than two months a response to the District's request which could have begun with a telephone call.³

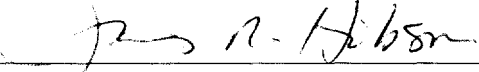
Until we are shown otherwise by good-faith responses from carriers to PSAP requests, we are assuming that the more detailed the definition of "readiness" in the wireless E9-1-1 rules, the more the carriers will find to nit-pick. Accordingly, the District endorses the comments of NENA and APCO which urge the Commission to keep the prerequisites simple and minimal. A public safety authority's statement that its own upgrade funding is assured should be enough

³ Fortuitously, VoiceStream's representative, Jim Nixon, is a former 9-1-1 official and is well known in the public safety community. Writing letters is good for making records, but it is not the only way to communicate.

to trigger the carrier's response to a PSAP request. Once that process starts, detailed requirements will emerge that probably could never have been identified in advance.

Respectfully submitted,

TARRANT COUNTY 9-1-1 DISTRICT

By 

James R. Hobson
Miller & Van Eaton, P.L.L.C.
1155 Connecticut Avenue, N.W., Suite 1000
Washington, D.C. 20036
(202) 785-0600

July 25, 2001

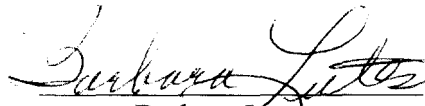
ITS ATTORNEY

CERTIFICATE OF SERVICE

The foregoing "Comments of Tarrant County 9-1-1 District" were mailed today to:

Jason Marshall
Nichols, Jackson, Dillard, Hager & Smith, L.L.P.
1800 Lincoln Plaza
500 North Akard
Dallas, Texas 75201

July 25, 2001


Barbara Lutes



June 20, 2001

John Munn
Executive Director
Tarrant County 9-1-1 District
100 East 15th St., Suite 420
Fort Worth, TX 76102

Re: Phase II Request Verification

Dear Mr. Munn:

We received your Phase II wireless E9-1-1 service request letter dated April 18, 2001. VoiceStream is committed to meeting the FCC timelines for deploying enhanced 9-1-1 services. Deployment of Phase II service will require an enormous commitment of planning, engineering, coordination and construction resources from all parties including the PSAP, 9-1-1 service provider and VoiceStream Wireless. In order to meet the FCC timelines, it is critical that we make the most efficient use of the limited resources available to us for Phase II deployment.

As a first step to meeting these deployment timelines, we must validate each Phase II service request we receive to make sure that we focus our efforts on those PSAPs which are fully prepared to implement Phase II service. In this regard, we ask that you confirm that you have satisfied the prerequisite conditions established by the FCC in the Second Memorandum Opinion and Order Adopted November 18, 1999:

"The two prerequisites in our current rules for a carrier's obligation to implement either Phase I or Phase II are that: (1) the carrier has received a request for such service from a PSAP that has the capabilities of receiving and using the data, and (2) a mechanism for recovering the costs of the service is in place."

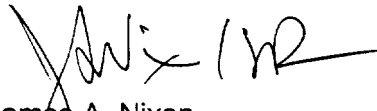
The FCC established these prerequisites in an effort to ensure that implementation resources are applied only to areas in which the PSAP is currently able to make effective use of the data. We ask that you confirm via return correspondence that your PSAP is *currently* capable of receiving and using Phase II data and that a cost recovery mechanism is in place to cover PSAP costs. Generally, we understand the minimum PSAP requirements for Phase II include 9-1-1 network and CPE equipment capable of handling the increased data flow (20 digits plus latitude and longitude digits) and PSAP mapping equipment which can display this location data in a meaningful and useful manner for the call taker. While we do not intend to establish PSAP equipment requirements, we do wish to collect information on how your PSAP intends to use the

data. This will help all parties identify implementation issues early in the process and, hopefully, overcome any problems which might delay implementation.

VoiceStream does not have any agreements in place with 3rd party Non-Call Associated Signaling (NCAS) providers (i.e. SCC, XYPoint or TSI) at this time, but we will gladly work with any such providers you or the LEC may have employed. We intend to use the LEC supplied Call Associated Signaling (CAS) or Hybrid solution to provide Phase 2 data. Please make sure to advise us which delivery method(s) your PSAP can accept so we can coordinate our efforts efficiently. We are developing our Phase 2 implementation to TIA/EIA/IS J-STD-036 specifications, which is the standard we have been told will be used for Phase 2. Please verify with your 9-1-1 service provider that they and their database vendors, if any, are using this standard. If they are not, there could be serious technical problems which must be resolved before our Phase 2 implementation can proceed. We will be happy to discuss these issues with your 9-1-1 service provide in an effort to ensure a successfully implementation.

Should you have any questions please contact me so we can discuss the issues. Thank you in advance for your prompt reply.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Nixon' with a stylized flourish at the end.

James A. Nixon
Senior Manager of Regulatory Affairs